UNITED STATES BANKRUPTCY COURT DISTRICT OF RHODE ISLAND

IN RE: RICHARD N. LARENCE and DORIS J. LARENCE

No: 10-11122 Chapter 13

Debtors

MOTION TO EXTEND TIME TO FILE CHAPTER 13 PLAN

Now come the Debtors in the above entitled matter, by and through their attorney, and respectfully request that this Honorable Court extend the time to file their Chapter 13 plan until April 13, 2010. In support thereof, the Debtors state the following:

- 1. The Debtors filed their Chapter 13 petition for relief on March 22, 2010. A notice of missing documents was filed on March 23, 2010 requiring the filing of the missing documents [Chapter 13 plan] by April 6, 2010.
- 2. Additional time is needed to complete the amended plan and review it by the Debtors and their attorney.
- 3. The granting of this additional time is in the best interests of justice and will not prejudice the Debtors or any other party in interest.

WHEREFORE, the Debtor respectfully requests additional time to file said amended plan until April 13, 2010.

Dated: April 7, 2010

RICHARD N. LARENCE and DORIS J. LARENCE By their attorney,

/s/ David L. Graham

David L. Graham, Esq., #3034 1804 Mineral Spring Avenue No. Providence, RI 02904 (401) 861-4056

CERTIFICATE OF SERVICE

I, David L. Graham, hereby certify that I have sent a copy of this **MOTION TO EXTEND TIME TO FILE CHAPTER 13 PLAN**, via ECF transmission, to each of the below listed parties on the 7th day of April, 2010.

Parties served:

John Boyajian, Trustee Boyajian, Harrington & Richardson 182 Waterman Street Providence, RI 02906

Office of the United States Trustee 10 Dorrance Street, Room 915 Providence, RI 02903

/s/ David L. Graham

David L. Graham